

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

WAYNE BALIGA,

Plaintiff,

- against -

LINK MOTION INC. (F/K/A NQ MOBILE INC.),
VINCENT WENYOUNG SHI, JIA LIAN, XIAO YU,
Defendants.

No. 1:18-cv-11642-VM-DCF

**ORDER TO SHOW CAUSE TO ENJOIN EXTRAORDINARY
GENERAL MEETINGS AND STRIKE
PROPOSED SHAREHOLDER RESOLUTIONS**

Upon the declaration of Michael James Maloney, dated March 15, 2022, and all exhibits attached thereto, and the accompanying memorandum of law dated March 15, 2022, and all documents referenced therein, it is

ORDERED that Robert Seiden, as temporary receiver (“Receiver”) of Link Motion Inc., f/k/a NQ Mobile Inc. (the “Company”) show cause before a motion term of this Court at room ____, United States Courthouse, 500 Pearl Street, in the City, County, and State of New York on _____, 2022 at ____ o’clock in the _____ noon thereof, or as soon thereafter as counsel may be heard, why an order should not be issued pursuant to Federal Rule of Civil Procedure 65

(a) enjoining all extraordinary general meetings (“EGMs”) of the Company called by the Receiver, including those noticed for March 18 and 19, 2022 (the “1st Notice” and “2d Notice,” respectively), until at least thirty (30) days after the District Court issues its decision on the Report & Recommendation issued by the Hon. Magistrate Judge Debra Freeman (Dkt. No. 275) (the “Report & Recommendation”) regarding the pending motion by Defendant Vincent Wenyoung

Shi (“Mr. Shi”) to discharge the Receiver and dissolve the preliminary injunction, Dkt. Nos. 227, 230, 246, 277 (the “Discharge Motion”), and

(b) striking from the 2d Notice of EGM scheduled for March 19, 2022 that certain proposed resolution number 2.1, recommending that the shareholders vote to direct the Company to continue the receivership and comply with the Order of this Court dated February 1, 2019 (*i.e.*, Dkt. No. 26); and

(c) striking from the 2d Notice of EGM scheduled for March 19, 2022 that certain proposed resolution number 2.2 recommending that the shareholders vote to ratify the prior actions of the Receiver; and it is further

ORDERED that, sufficient reason having been shown therefor, pending the hearing of Mr. Shi’s application for a preliminary injunction pursuant to Federal Rule of Civil Procedure 65, the EGMs of the Company called for March 18 and 19, 2022 are hereby temporarily enjoined.

ORDERED that service by email and ECF upon Plaintiff or his counsel and Receiver or his counsel on or before _____ shall be deemed good and sufficient service thereof.

Dated: New York, New York

_____, 2022

United States Magistrate Judge